

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

SANDRA RODRÍGUEZ-COTTO;
RAFELLI GONZÁLEZ-COTTO

Plaintiffs,

v.

WANDA VÁZQUEZ-GARCED, Governor of
Puerto Rico; **INÉS DEL C. CARRAU MARTÍNEZ**,
Interim Secretary of Justice of Puerto Rico; **PEDRO**
JANER, Secretary of the Department of Public
Safety of Puerto Rico; **HENRY ESCALERA**,
Commissioner of the Puerto Rico Police Bureau, all
in their official capacities

Defendants.

CIVIL No. 20-01235 (PAD)

RE: Preliminary and Permanent
Injunction

INFORMATIVE MOTION

TO THE HONORABLE COURT:

COME NOW, co-defendants **Wanda Vázquez-Garced**, Governor of Puerto Rico; **Inés del C. Carrau-Martínez**,¹ Interim Secretary of Justice of Puerto Rico; **Pedro Janer**, Secretary of the Department of Public Safety of Puerto Rico; and, **Henry Escalera**, Commissioner of the Puerto Rico Police Department, all in their official capacities, without waiving any right or defense arising from Title III of *Puerto Rico Oversight, Management and Economic Stability Act* (“PROMESA”), 48 U.S.C. §§2101 *et seq.*, and the Commonwealth’s Petition under said Title or under this case and without submitting to the Court’s jurisdiction, and through the undersigned attorney, very respectfully **STATE** and **PRAY** as follows:

¹ Originally, the Complaint was filed against then-Secretary of Justice, Dennise N. Longo-Quñones. However, since Attorney Longo-Quñones resigned, she has been automatically substituted as a party by Hon. Inés del C. Carrau-Martínez, Interim Secretary of Justice. See Fed. R. Civ. P. 25(d).

1. On July 1, 2020, the Court held a *Status Conference* in which Defendants informed that Senate Bill No. 1582 was passed by the Commonwealth of Puerto Rico's Legislature and that the Governor had a constitutional term of thirty (30) days to sign it into law. *See* Docket No. 33 at 1. Defendants accurately represented to the Court that Senate Bill No. 1582 would be signed into law and that it was not a matter of *if* but of *when* the Governor would do so. *Id.* Consequently, the Court ordered the parties to file a motion to inform if said bill was signed into law. *Id.* at 3.

2. **Defendants hereby inform that Hon. Wanda Vázquez-Garced, Governor of Puerto Rico, signed Senate Bill No. 1582 into law on July 13, 2020.** Thus, Senate Bill No. 1582 became Act No. 66-2020, which substantially amended Section (a) and suppressed Section (f) of Article 6.14 of the *Puerto Rico Public Safety Department Act*, Act No. 20-2017.

WHEREFORE, the Defendants request that the Court **notes** that Senate Bill No. 1582 was signed into law on July 13, 2020.

I HEREBY CERTIFY that the undersigned attorney electronically filed the foregoing with the Clerk of the Court, which will send notification of such filing to the parties subscribing to the CM/ECF System.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of July 2020.

INÉS DEL C. CARRAU-MARTÍNEZ

Interim Secretary of Justice

WANDYMAR BURGOS-VARGAS

Deputy Secretary in Charge of Litigation

SUSANA I. PEÑAGARÍCANO-BROWN

Director of Legal Affairs

Federal Litigation and Bankruptcy Division

/s/ Juan C. Ramírez-Ortiz

JUAN C. RAMÍREZ-ORTIZ

USDC-PR No. 306507

Department of Justice of Puerto Rico

Federal Litigation Division

PO Box 9020192

San Juan, PR 00902-0192

Phone: (787)721-2900, ext. 1421

juramirez@justicia.pr.gov